

# EXHIBIT 2

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BUNGIE, INC., a Delaware corporation,  
Plaintiff,  
v.  
KUNAL BANSAL, an individual, d/b/a;  
LAVICHEATS.COM; and DOES 1-30,  
inclusive,  
Defendants.

Case No. 2:21-cv-1111-TSZ

DECLARATION OF ALLISON NIXON RE:  
SERVICE OF DEFENDANT KUNAL  
BANSAL BY WEBSITE FORUM POST

I, Allison Nixon, declare and state as follows:

1. I am over the age of 21 years. I make this Declaration based upon personal knowledge unless otherwise stated, in which case I believe the information to be true, or based upon documents maintained by Unit 221B, LLC in the ordinary course of its business or publicly-available documents.

2. I am the Chief Research Officer for Unit 221B, LLC (“Unit 221B”), an investigative and threat-intelligence company that specializes in advanced cyber investigations. I have approximately 10 years of experience in the field of cyber intelligence.

3. As part of its investigation of this matter, Bungie—through its counsel in this action, Focal PLLC—retained Unit 221B to conduct a cyber investigation of the website <lavicheats.com> (the “Lavicheats Website”).

4. On November 22, 2021, using text provided by counsel for Bungie, Focal PLLC,

DECLARATION OF ALLISON NIXON  
(Case No. 2:21-cv-1111-TSZ) – 1

**focal PLLC**  
900 1st Ave. S., Suite 201  
Seattle, Washington 98134  
telephone (206) 529-4827  
fax (206) 260-3966

1 I created and submitted a post to the “MediaSection” public discussion forum on the Lavicheats  
2 Website. Because a submitted post is not published and viewable to visitors to that website  
3 public discussion forum on the Lavicheats Website if the poster does not have a registered  
4 account with the website, I submitted the post via an account named “ElectronicService” I  
5 registered with the website for this purpose. The post included a link to (a) the Summons, (b) the  
6 Complaint, and (c) a copy of the Court’s Order granting leave to serve Defendant Kunal Bansal  
7 by such a forum posting. Attached hereto as **Exhibit A** is a true and correct copy of the content  
8 of the post I submitted on November 22, 2021, to the “MediaSection” public forum on the  
9 Lavicheats Website.

10 5. The post described in paragraph 4 and shown in Exhibit A hereto was  
11 successfully submitted on November 22, 2021.

12 6. After submitting the post described in paragraph 4 using the registered account  
13 described in that paragraph, I confirmed that the post was published and publicly viewable to  
14 visitors to the “MediaSection” public discussion forum on the Lavicheats Website. Attached  
15 hereto as **Exhibit B** is a true and correct copy of a screenshot I captured of the “MediaSection”  
16 public discussion forum on November 22, 2021, showing the publicly-viewable post.

17 7. It appears that following the successful publication of the post on the forum, on  
18 the morning of November 23, 2021, the post was removed. The fact that the post was removed a  
19 number of hours after it was published and publicly viewable supports the conclusion that the  
20 post was seen by, and the act of removal was done by, a human (i.e., a site administrator), as any  
21 automated process would have removed the post immediately. Nonetheless, the post was  
22 publicly viewable on the Lavicheats Website from the time of posting (approximately 5:15 p.m.  
23 PST on November 22, 2021) until approximately 6:40 a.m. PST on November 23, 2021, when it  
24 was removed from the website.

25 //

26 //

27 //

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct to the best of my knowledge.

3 Executed this 24th day of November, 2021, at Harrison, New Jersey.

4 DocuSigned by:

*Allison Nixon*

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ALLISON NIXON

# EXHIBIT A

Title REQUIRED

NOTICE to Defendant Kunal Bansal - Service of Legal Process - Bungie, Inc. v. Bansal, et al., Case No. 2:21-cv-1111-TSZ (W.D. Wash.)

Add Tags...

REQUIRED

B I U S & <> ☺ ☹ Size

Attn: Defendant Kunal Bansal, aka "Lavi"

Pursuant to the Order of the United States District Court for the Western District of Washington dated September 22, 2021, you -- Defendant Kunal Bansal -- are hereby served with the Summons and Complaint in the case captioned Bungie, Inc. v. Bansal, et al., Case No. 2:21-cv-1111-TSZ, pending in the aforementioned Court.

The referenced Order, the Summons, and the Complaint are located at the following link:

<https://spaces.hightail.com/space/TrubsLdV3G>

For quick reference, the following is stated in the Summons included in the link above:

*"A lawsuit has been filed against you.*

*Within 21 days after service of this summons on you (not counting the day you received it) -- or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) -- you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney. . . .*

*If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court."*

The name and address of the Court is the United States District Court for the Western District of Washington, 700 Stewart Street, Suite 2310, Seattle, Washington 98101. The names and contact information of Plaintiff's attorneys are set forth in the Summons.

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x

# EXHIBIT B

NOTICE to Defendant Kunal Bansal

lavi cheats.com/forum/24-mediasection/

Home > Public Discussions > MediaSection

MediaSection

Videos, Wins And information Submitted by Users

Unread Content

Mark site read

Follow 1

Start new topic

MARK FORUM AS READ

SORT BY

★

NOTICE to Defendant Kunal Bansal - Service of Legal Process - Bungie, Inc. v. Bansal, et al., Case No. 2:21-cv-1111-TSZ (W.D. Wash.)

By ElectronicService, just now

0 replies

0 views

ElectronicService

Just now

●

Bloodhunt Cheat Video

By Maximus, October 9

0 replies

200 views

Maximus

October 9

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EscapeFromTarkov Potato\_xD

By Potato\_xD, June 27

0 replies

1.2k views

Potato\_xD

June 27

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مالك رنك كريسبي | Rogue Company Hack

By TrOjAniIX, February 6

0 replies

1.3k views

TrOjAniIX

February 6